

April 23, 2009

Ms. Laura Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

In response to your telephone call yesterday, the National Republican Congressional Committee (FEC ID # C0075820) would like to provide this additional information regarding its best efforts compliance, as initially included with its September 15, 2008 response to your Requests for Additional Information dated August 13, 2008 regarding our 2008 June and July monthly FEC reports.

The Committee believes its procedures are in compliance with the best efforts provisions cited in your letter. As an initial matter, all committee solicitations notify the donor that the NRCC is required by federal law to report occupation and employer information, and request that the donor provide such information. For those donors who choose not to provide the information, the NRCC (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow-up letters do not solicit any additional contribution from the donors, and include a postage-paid return envelope for the donors' convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original reports is included on the amendments filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The NRCC has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. In addition, the Committee notes that it updates its employer/occupation data as it is received from donors.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee
